

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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In re: Bair Hugger Forced Air Warming  
Devices Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates to:  
ALL ACTIONS

**RULE 7.1(F) CERTIFICATE OF  
COMPLIANCE REGARDING  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' OBJECTION TO  
JULY 17, 2020 ORDER  
REGARDING PERMANENT  
SEALING**

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I, Benjamin W. Hulse, certify that Defendants' Opposition to Plaintiffs' Objection to July 17, 2020 Order Regarding Permanent Sealing ("Memorandum") complies with the limits of Local Rule 7.1(f) and with the type-size limit of Local Rule 7.1(h).

I further certify that, in preparation of the above document, I used Microsoft Word 2016, and that this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations in the following word count.

I further certify that the Memorandum contains 2198 words.

Dated: August 14, 2020

Respectfully submitted,

*s/ Benjamin W. Hulse*

Benjamin W. Hulse (MN #0390952)

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